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*Motion pro hac vice granted 9/9/11.
**Motion pro hac vice granted 6/11/12.
***Motion pro hac vice granted 2/1/16.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION

Lair, et al.,

Plaintiffs,

v.

Jonathan Motl, et al.,

Defendants.

Case No. 6:12-cv-00012-CCL

Declaration of Pat Wagman

I, Patrick "Pat" Wagman, make the following declaration pursuant to 28

DECLARATION OF
PAT WAGMAN

U.S.C. § 1746:

1. I am over eighteen years of age and my statements set forth below are based on personal knowledge.

2. In 2002, I successfully ran to represent House District 26, and was re-elected in 2004. During that time, I got to know some fellow Republicans who introduced me to Christian LeFer. He and I became friends because we shared the same views.

3. In 2010, I unsuccessfully ran for Senate District 31. During that campaign, I used Direct Mail for my campaign letters.

4. When I first began using Direct Mail's services, Allison LeFer gave me a detailed questionnaire to fill out. I have no direct knowledge as to how the profile was used, but believe it was a tool used to help draft the campaign letters I paid for.

5. For each of these services provided by Direct Mail, I received an invoice and paid the amount detailed in the invoice. I had no reason to believe that these invoices were incorrect and believed the costs were reasonable for the services provided.

6. I am not familiar with the term "the works" but believe it refers to paying Direct Mail to help draft two to three campaign letters, and the printing and

mailing of those letters.

7. I never made an arrangement, explicit or implied, with Western Tradition Partnership, American Tradition Partnership, National Right to Work, or Direct Mail that, in exchange for any efforts to get me elected, I would act in an official government capacity at their direction as a public official.

8. I have never and would never enter into such an agreement with anyone. Nor I am aware of any other legislator or candidate doing the same.

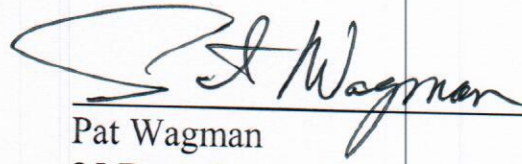
9. If anyone had asked me to enter into such an agreement, I would have said there was no way that would happen and it would have meant the end of our friendship.

10. In January 2014, Commissioner Motl notified me that he was expanding a complaint against 2010 candidate Dan Kennedy to include me, and in April 2014, Commissioner Motl issued findings of coordination and in-kind corporate contributions in violation of campaign finance law based on my association with Direct Mail. He filed a civil complaint against me in civil court promptly thereafter. None of these documents allege quid pro quo corruption.

11. I most likely will not run again because of these allegations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 4th, 2016.

A handwritten signature in black ink, appearing to read "Pat Wagman", written over a horizontal line.

Pat Wagman
25 Deep Creek Bench Rd.
Livingston, MT 59047

DECLARATION OF
PAT WAGMAN